

EXHIBIT 125

In the Matter Of:

USA v

GOOGLE

CHRIS LASALA

August 17, 2023



419

1
2 UNITED STATES DISTRICT COURT
3 FOR THE EASTERN DISTRICT OF VIRGINIA
4 -----X
5 UNITED STATES OF AMERICA, et al.,

6 PLAINTIFF,

7 -against-

8 GOOGLE LLC,

9 DEFENDANT.

10 Civil 1:23-cv-00108
11 -----X

12 UNITED STATES DISTRICT COURT
13 SOUTHERN DISTRICT OF NEW YORK
14 -----X

15 In Re: Google Digital Advertising Antitrust
16 Litigation

17 1:21-MD-3010 (S.D.N.Y.)
18 -----X

19 ***HIGHLY CONFIDENTIAL***
20

21 VOLUME II
22

23 DEPOSITION OF CHRIS LASALA
24 Trumbull, Connecticut

25 Thursday, August 17, 2023

Reported by:

Rebecca Schaumloffel, RPR, CLR

JOB #: 2023-906734

TIME: 7:03 a.m. Eastern

420

1

2 APP E A R A N C E S:

3

4 U.S. DEPARTMENT OF JUSTICE
5 Antitrust Division
950 Pennsylvania Avenue
Washington, DC 20530
6 BY: DAVID TESLICKO, ESQ.
JULIA WOOD, ESQ., (Zoom)

7

8

9

10 AXINN, VELTROP & HARKRIDER, LLP
11 Attorneys for Google
1901 L Street NW
Washington, DC 20036
12 BY: DANIEL BITTON, ESQ.
DAVID PEARL, ESQ.

13

14

15

16 PAUL WEISS, RIFKIND, WHARTON & GARRISON,
LLP
17 Attorneys for Google
2001 K Street NW
Washington, DC 20006
18 BY: JOSEPH BIAL, ESQ.

19

20

21

22 BERGER MONTAGUE
23 Attorneys for Publisher Class
1818 Market Street, Suite 3600
Philadelphia, Pennsylvania 19103
24 BY: PATRICK F. MADDEN, ESQ.

25

421

1
2 Appearances (continued:)
3

4 AHDOOT WOLFSON
5 Attorneys for Advertiser Class
6 2600 W. Olive Avenue
7 Burbank, California 91505
8 BY: THEODORE W. MAYA, ESQ.

9 KOREIN TILLERY
10 Attorneys for Publisher Class
11 505 North 7th Street
12 Suite 3600
13 St. Louis, Missouri 63101
14 BY: ANDREW ELLIS, ESQ.

15 ALSO PRESENT:

16 Alex Bergersen, Esq., in-house,
17 Google
18 Lem Lattimer, Lexitas videographer

19 ZOOM PARTICIPANTS:

20 Deane Carstensen, Lexitas
21 Abhihek Mukund, Esq., Connecticut
22 Attorney General
23 Jonathan Wilkerson
24 Zeke DeRose III, Esq., Lanier Law
25 Firm
Cuong Pham

* * *

482

1 C. LASALA
2 value of offering a platform needs to be
3 measured in terms of lift and added value
4 over a hypothetical Buyside only offering.
5 While a conclusive study to measure this
6 precisely is very difficult to do (partners
7 mostly use only one platform at a time.
8 Platform deals are often intertwined with
9 inventory access deals making true
10 counterfactual studies very difficult, etc),
11 we do have a lot of evidence of value this
12 has added for us over the years."

13 Do you see that?

14 A. I do.

15 Q. Is Google Ad Manager a platform as
16 that term is used here?

17 A. We use that phrase "platform" for
18 Ad Manager.

19 Q. And so publishers using Google Ad
20 Manager will mostly only use Google Ad
21 Manager, right?

22 MR. BITTON: Objection to form.

23 Lacks foundation.

24 A. Repeat the question, please.

25 Q. So publishers using Google Ad

483

1 C. LASALA

2 Manager will mostly only use Google Ad

3 Manager, right?

4 MR. BITTON: Objection to form.

5 A. I think it is most common for a
6 publisher to implement a single ad server,
7 whether it's Google's or someone else. There
8 are small instances where they would do both.

9 Q. And Google Ad Manager is an
10 example of where the platform deal is
11 intertwined with inventory access; is that
12 fair?

13 MR. BITTON: Objection to form.

14 A. So, you know, just reacting to the
15 statement, what that means is we would -- it
16 is possible to have closed or negotiated a
17 deal with a publisher to have used our
18 platform the way we're talking about it, so
19 the ad server, but that, by no means,
20 requires the publisher to then call AdX
21 demand as part of the negotiated deal to run
22 the ad server.

23 So they would be different
24 discussions. So like the word "intertwined"
25 is not something I agree with because we

666

1

2 C E R T I F I C A T E

3

4 STATE OF NEW YORK)
5 : SS.:
COUNTY OF NASSAU)

6

7 I, REBECCA SCHAUMLOFFEL, a Notary

8 Public for and within the State of New York,

9 do hereby certify:

10 That the witness whose examination
11 is hereinbefore set forth was duly sworn and
12 that such examination is a true record of the
13 testimony given by that witness.

14 I further certify that I am not
15 related to any of the parties to this action
16 by blood or by marriage and that I am in no
17 way interested in the outcome of this matter.

18 IN WITNESS WHEREOF, I have hereunto
19 set my hand this 18th day of August, 2023.

20 

21 REBECCA SCHAUMLOFFEL

22

23

24

25